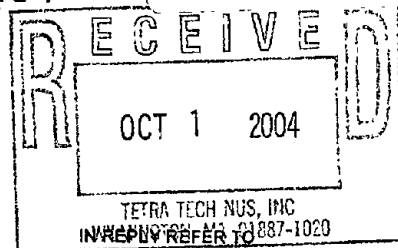




File: 5152-3.1 0379
DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, NORTHEAST
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090



5090
Code EV23/CF
SEP 28 2004

Ms. Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section
USEPA Region 1
1 Congress Street, Suite 1100
Boston MA, 02114-2023

SUBJECT: DRAFT FIVE YEAR REVIEW REPORT, NAVAL STATION NEWPORT,
RHODE ISLAND

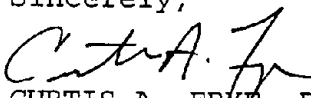
Dear Ms. Keckler:

Enclosed for your review is the Response to Comments on the Draft Five-Year Review Report, prepared for the Installation Restoration Project Sites at NAVSTA Newport. Responses have been prepared for the comments received from USEPA on August 9, 2004. RIDEM indicated via email on September 10, 2004 that they had no comments on the draft document.

As previously mentioned and noted in the attached responses, information pertaining to the Coddington Cove Rubble Fill Area, Tanks 53 and 56, and other sites and study areas as appropriate, will be revised in the draft final version of the report, which should be issued approximately October 15, 2004.

If you have any questions, please do not hesitate to contact me at (610) 595-0567 x142.

Sincerely,


CURTIS A. FRYE, P.E.
Remedial Project Manager
By Direction of the
Commanding Officer

5090

Code EV23/CF

SEP 28 2004

Enclosure: 1. Navy Responses to Comments from USEPA on the Draft
Five Year Review Report, Naval Station Newport, RI
(Comments Dated August 5, 2004)

Copy to:

P. Kulpa, RIDEM

C. Mueller, NSN

NAVSTA RAB (c/o C. Mueller - 4 copies)

NAVSTA Repositories (c/o C. Mueller - 4 copies)

J. Stump, Gannett Fleming

S. Parker, TtNUS

P. Call, TtNUS

**Response to Comments from USEPA
On the Draft Five-Year Review,
Naval Station Newport
Comments Dated August 5, 2004**

GENERAL COMMENTS

Comment 1: *Overall, the Five-Year Review appears to have been conducted in accordance with the Comprehensive Five-Year Review Guidance. The report presents applicable information including overall site background, site characteristics, ARARs, ROD summary, remedial objectives, remedy implementation summary, monitoring information, protectiveness statement, and status of other sites. However, a subsection where the progress since the last review is summarized was not included. Such a subsection would present the protectiveness statements from the last review, status of recommendations and follow-up actions from the last review and status of issues identified in the last review. It may be worthwhile to separately list a chronology and cleanup schedule for each study area or operable unit.*

Response: A subsection will be added to Sections 2.4 and 3.4 covering progress since the last review (see also Specific Comment 5). As noted in the response to Specific Comment 13, the sites and study areas briefly discussed in Section 4 are not subject to the five-year review requirement since remedial actions under CERCLA §121 have not yet been selected. The Navy has included a brief mention of these sites and study areas in Section 4 since they are included in the Federal Facility Agreement. Should a remedial action be selected under CERCLA §121 for these sites and study areas in the future, a chronology will be included for each site or study area that is subject to future five-year reviews.

Comment 2: *Owing to the detections of VOCs in groundwater and gas samples and the proximity of residences at the site, EPA recommends evaluation of inhalation through vapor intrusion to indoor air exposure pathway from groundwater and soil. EPA's Draft Guidance for vapor intrusion to indoor air pathway should be followed and can be found at <http://www.epa.gov/correctiveaction/eis/vapor.htm>. Please note that the inhalation evaluation can be done using a tiered approach and qualitatively screened. Since the VOC concentrations detected are below AWQCs (as presented in Table 2-2 of the report) it does not appear that a risk calculation will be necessary.*

Response: The draft EPA guidance for evaluating the vapor intrusion to indoor air pathway screening criteria defines "inhabited buildings" as being located "within approximately 100 ft laterally or vertically of known or interpolated soil gas or groundwater contaminants." There are no inhabited buildings meeting this definition near McAllister Point or Tanks 53 and 56 at Tank Farm 5. The Navy has no plans to develop either site for residential use in the future. Most of the detections of VOCs in groundwater at the McAllister Point Landfill have been slightly higher than the method reporting limit; at Tank 53 any VOC detections have been slightly below the method reporting limit. For all of the toxic and volatile VOCs listed in Table 1 of the EPA guidance, the concentrations detected in the McAllister Point Landfill and Tank 53 monitoring wells are well below the target groundwater concentrations listed in Table 2c of the guidance (risk = 1×10^{-6}). The Navy believes no further evaluation of the vapor intrusion to indoor air pathway is required.

Comment 3: *EPA also recommends a comprehensive review of any detected levels of 1,1,1-trichloroethane (1,1,1-TCA) in groundwater at the site. If 1,1,1-TCA was used and detected at the site at levels exceeding EPA Region 9's risk-based levels used for screening, EPA recommends analysis for 1,4-dioxane in the groundwater samples at locations where 1,1,1-TCA was detected. 1,4-dioxane was normally used as a stabilizer for TCA and is classified by EPA as a probable carcinogen to humans based on animal studies.*

Response: 1,1,1-TCA was not a key constituent in the risk calculations summarized in the 1993 ROD for the McAllister Point Landfill. A review of the historical groundwater monitoring data indicated that 1,1,1-TCA has never been detected in 8 of the 11 monitoring wells; the only detections were at concentrations of 2J µg/l at two wells in January 1998, and 5 µg/l at one well in October 2000. 1,1,1-TCA was detected in the groundwater during the investigation at Tanks 53 and 56. However the groundwater treatment system successfully remediated the groundwater; 1,1,1-TCA was not detected in any of the Tank 53 monitoring wells during the most recent post-remedial action groundwater sampling event. The Navy believes that no further evaluation of 1,1,1-TCA or analysis for 1,4-dioxane is required.

Comment 4: *EPA is concerned that the five year review report does not discuss the Navy's plans to construct a golf course over the five tank farms present in the northern end of the base. Clearly, this proposed change in use could affect the protectiveness of the remedy at Tank Farm 5 because of the change in exposure pathway and frequency not previously evaluated (page 3-9 needs to be modified). The five year review report should assess the change in the exposure assumptions (which could affect the cleanup goals selected) and determine whether the remedy remains protective.*

Response: As noted in Section 4, further investigations and cleanup activities are ongoing at Tank Farms 1 through 5, under both the CERCLA Program and the RIDEM UST program. The Navy will evaluate reuse options, such as construction of a golf course, on the tank farm properties only after investigations and any required follow up actions are completed. No change in use is currently proposed for the Tank 53 and 56 area of Tank Farm 5 and thus no discussion of changes to exposure pathways or exposure assumptions are necessary at this time.

SPECIFIC COMMENTS

Comment 1: *p. 1-6, §1.2.2. The chronology of activities presented in the table is not comprehensive. Moreover, it is not consistent with events described within the five year review report. For example, the McAllister Point Landfill source control ROD is included but not the marine sediment/management of migration ROD. This table should be revised to more closely fulfill its objective. Also, additional reports have been issued after March 2004.*

Response: The Navy concurs and the chronology will be revised and updated.

Comment 2: *§2.0. Chapter 2 should clarify that Site 1 encompasses two operable units. OU1 is the source control RCRA C cap (onshore landfill) and OU4 comprises the marine sediments adjacent to the landfill. A summary of the monitoring data would lend support to the protectiveness statement*

- Response: The Navy concurs and the Chapter 2 text will be clarified and reference the two operable units. The Protectiveness Statement will be revised and will briefly summarize the monitoring data for both remedies.
- Comment 3:** *p. 2-10, §2.3.2. The fourth paragraph includes a misspelled chemical name. Fluorine is stated instead of fluorene. This typographical error should be revised as it changes the meaning of the sentence.*
- Response: The spelling of "fluorene" will be corrected.
- Comment 4:** *p. 2-14, §2.4.3. The third sentence discusses demolition of tanks. This was not part of the action taken at McAllister.*
- Response: The text will be revised.
- Comment 5:** *p. 2-15, §2.5. The assessment section does not have a subsection where the progress since the last review is summarized. Such a subsection would present the protectiveness statements from the last review, status of recommendations and follow-up actions from the last review and status of issues identified in the last review.*
- Response: A new subsection, Progress Since Last Review, will be added to Section 2.4. The new text will address the elements outlined in the EPA Guidance, as summarized in the comment. Note that the Navy will also make this change to Section 3.4.
- Comment 6:** *p. 2-17, ¶2. Since all of the contamination was removed as part of the sediment dredging, risks from the consumption of shellfish owing to site-related contaminants should be acceptable.*
- Response: The Navy concurs and text of this paragraph will be revised to note that implementation of the marine sediment remedy per the 2000 ROD has eliminated the ingestion exposure pathway.
- Comment 7:** *§2.5. The text describing remedial action performance states that the remedy included "off-shore" disposal. This is an apparent typographical error as the text probably should have been "off-site" disposal. However, the error changes the meaning of the sentence and therefore warrants correction.*
- Response: The text will be corrected to read "off-site" disposal.
- Comment 8:** *§2.8. The remedial action at OU4 cannot be considered complete until the eelgrass bed is restored or mitigated. Modify the third sentence to reflect that removal of the contaminated sediments and debris has been completed, but that the RA is not yet complete because of the on-going eelgrass work.*
- Response: The Protectiveness Statement will be revised to more clearly describe the remedial activities associated with OU4 that have been completed and the monitoring activities that continue.
- Comment 9:** *§3.0. A summary of the monitoring data would lend support to the protectiveness statement.*

Response: The Protectiveness Statement (Section 3.8) will be revised and will briefly summarize the monitoring data for the remedy.

Comment 10: *§3.5. The site 13 (Tank Farm 5, Tanks 53 and 56) inspection revealed non-secured and poor condition monitoring wells. This site inspection finding is not mentioned in the operations and maintenance assessment text. This finding should be part of the assessment discussion in section 3.5.*

Response: Additional observations from the site inspection report (Appendix B) will be added to Section 3.5.

Comment 11: *§3.7. The site 13 (Tank Farm 5, Tanks 53 and 56) inspection revealed non-secured and poor condition monitoring wells. There is neither a recommendation to correct this deficiency nor is there a recommendation to assess well integrity and repair monitoring wells before or during the round 5 sampling scheduled this summer.*

Response: Section 3.4.2, 4th paragraph, noted: "Activities are currently underway to repair the monitoring well network and conduct a fifth sampling round in summer 2004." The text of Section 3.7 will be revised and will briefly summarize the well repairs that have been completed since the issuance of the draft report in June 2004.

Comment 12: *§3.8. While the remedy for Tanks 53 and 56 may be protective of human health and the environment, it is important to note that Site 13 comprises all of the tanks in Tank Farm 5. Accordingly, additional investigation at the other tanks within Tank Farm 5 is warranted and the protectiveness of Site 13 should be characterized as 'protectiveness deferred.'*

Response: The comment is noted. However, the objective of a five-year review is to assess the protectiveness of a remedy selected for a site. In this case, the remedy selected and implemented to date covered only the groundwater operable unit for Tanks 53 and 56 at Tank Farm Five. Investigations in other portions of Tank Farm Five, which may lead to a separate decision document, are briefly discussed in Section 4.8.

Comment 13: *§4.0. Most of the sites in this chapter are lacking a statement about protectiveness and should be characterized as 'protectiveness deferred' because they are still in the investigation phase.*

Response: The comment is noted. However, EPA's Comprehensive Five-Year Review Guidance states that the five-year review requirement "applies to all remedial actions selected under CERCLA §121." Since most of the sites discussed in Section 4.0 are still in the investigation phase, they are not subject to the five-year review requirement. In order to clarify this point, a statement will be added to each subsection noting that should a remedial action be selected under CERCLA §121 for the site in the future, the protectiveness of the selected remedy will be reviewed in subsequent five-year reviews for NAVSTA Newport.

Comment 14: *§4.3. The SASE indicated that either a remedial investigation or a removal action would be appropriate next steps for this site. The text in this section is not consistent with previous reports.*

Response: The Navy concurs and will revise the text to clarify the conclusions of the SASE.

Comment 15: *p. 4-3, ¶3. EPA disagrees that the oil in the soil is "...likely immobile and degrading...." EPA has documented this in numerous letters.*

Response: EPA's opinion is noted. The text was taken from the May 2003 Fact Sheet Update for OFFTA. A reference to this document will be added to the 3rd paragraph.

Comment 16: *p. 4-3, ¶4. EPA's concern over the increased use of Katy Field extends beyond metals contamination. The site is also heavily contaminated with PAHs. EPA was concerned that there was an increase in site exposure time over what previous risk assessments determined what was safe. Moreover, at the time, the site was not adequately characterized to determine that the existing use was safe.*

Response: The text will be revised to reflect the EPA concerns noted in the comment.

Comment 17: *p. 4-4, ¶2. EPA does not believe that monitoring the sediments offshore of OFFTA is protective of human health and the environment. Areas of both high and intermediate risk exist - even decades after fire training activities ceased - and there are numerous areas that exceed the preliminary remediation goals. While the fence may limit human exposure to the area, it does nothing to protect the adjacent ecosystem.*

Response: The comment is noted. The paragraph will be revised and updated to address the current status of the interim removal action for soils and will mention that risks associated with groundwater and sediments still need to be addressed.

Comment 18: *§4.9. Study Area 17 includes all of former Building 32 and any contamination emanating from it.*

Response: The Navy concurs and the text of Section 4.9 will be revised to reflect that Study Area 17 encompasses all of former Building 32 and any contaminants found to originate there.